

To: Daniel Halden[Daniel.Halden@lacity.org]; Christine Petersa[christine.peters@lacity.org]; George Hakopiants[george.hakopiants@lacity.org]
From: Jeanne Min
Sent: Tue 12/5/2017 10:36:11 PM
Subject: Fwd: Pending CPRA Request Re: Additional Documents Involving Target

Hi Dan:

I have one example here. Do you have others?

----- Forwarded message -----

From: Dan Wright <dan@robertsilversteinlaw.com>

Date: Tue, Dec 5, 2017 at 2:28 PM

Subject: Fwd: Pending CPRA Request Re: Additional Documents Involving Target

To: Jeanne Min <jeanne.min@lacity.org>

Cc: Esther Kornfeld <Esther@robertsilversteinlaw.com>, Robert Silverstein <Robert@robertsilversteinlaw.com>, Veronica Lebron <Veronica@robertsilversteinlaw.com>

Jeanne -

Thank you for your request for clarification. Yes, you may exclude from Item No. 6 emails where the named individuals were copied on a mass email along with the Council office, but nothing in the communication discusses those individuals. We would agree to this if you could forward to me three examples of the types of mass mail communications you say do not involve the persons listed in the request.

If you can send three of those examples now, we can reach agreement on this point.

Thank you.

Daniel Wright

Daniel E. Wright, Esq.
The Silverstein Law Firm, APC
215 North Marengo Avenue, 3rd Floor
Pasadena, CA 91101-1504
T (626) 449-4200
F (626) 449-4205
Email: Dan@RobertSilversteinLaw.com
Website: www.RobertSilversteinLaw.com (<http://www.robertsilversteinlaw.com/>)

=====

The information contained in this electronic mail message is confidential information intended only for the use of the individual or entity named above, and may be privileged. The information herein may also be protected by the Electronic Communications Privacy Act, 18 USC Sections 2510-2521. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please immediately notify us by telephone (626-449-4200), and delete the original message. Thank you.

>>>

From: Jeanne Min <jeanne.min@lacity.org>
To: Dan Wright <Dan@robertsilversteinlaw.com>
Date: 12/5/2017 2:22 PM
Subject: Fwd: Pending CPRA Request Re: Additional Documents Involving Target
Mr. Wright:
Any news on my request for clarification?

----- Forwarded message -----

From: Jeanne Min <jeanne.min@lacity.org>

Date: Tue, Nov 28, 2017 at 4:35 PM

Subject: Re: Pending CPRA Request Re: Additional Documents Involving Target

To: Dan Wright <dan@robertsilversteinlaw.com>

Cc: Esther Kornfeld <Esther@robertsilversteinlaw.com>, Robert Silverstein <Robert@robertsilversteinlaw.com>, Veronica Lebron <Veronica@robertsilversteinlaw.com>

Mr. Wright:

Thank you for your response.

I have one more clarifying question for you. Many of the searches have produced emails where the individuals listed in your Item #6 may be a recipient of a mass group email, but not referred to in the body of the email.

For example, we have an email from a community member sent to dozens of names/emails, in which Bill Zide is listed in his HSDNC capacity, but the content of the email does not refer to nor relate to Bill Zide nor Target specifically.

Do you want those documents produced? If not, that could significantly cut down the time needed to comply with your entire request.

Please advise,
Jeanne Min

On Tue, Nov 28, 2017 at 4:25 PM, Dan Wright <dan@robertsilversteinlaw.com> wrote:

Ms. Min -

So I think we have clarified that it is unlikely that any work or emails will be forwarded to us during the period of December 15, 2017 to January 2, 2017. I agree, that if you or your staff waited until then, in reality, you would be extending the time to respond to after the New Year.

So, I appreciate your response and asking staff to pick up the pace of searching for and producing responsive records, and that you will provide documents as they come to you on a rolling basis leading up and including December 15.

It is my experience that the Council office goes silent when officially closed for the holiday. That said, I know that some Chiefs of Staff and others may work unofficially during the break even though the office is officially closed and not answering the phone.

So if you have further documents to produce on December 18, 2017 or thereafter, our office will be generally open and available to receive them via email.

Thank you for the clarification.

Best,

Daniel Wright

Daniel E. Wright, Esq.
The Silverstein Law Firm, APC
215 North Marengo Avenue, 3rd Floor
Pasadena, CA 91101-1504
T (626) 449-4200
F (626) 449-4205
Email: Dan@RobertSilversteinLaw.com
Website: www.RobertSilversteinLaw.com (<http://www.robertsilversteinlaw.com/>)

=====

The information contained in this electronic mail message is confidential information intended only for the use of the individual or entity named above, and may be privileged. The information herein may also be protected by the Electronic Communications Privacy Act, 18 USC Sections 2510-2521. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please immediately notify us by telephone (626-449-4200), and delete the original message. Thank you.

>>>

From: Jeanne Min <jeanne.min@lacity.org>
To: Dan Wright <dan@robertsilversteinlaw.com>
CC: Esther Komfeld <Esther@robertsilversteinlaw.com>, Robert Silverstein <Robert@robertsilversteinlaw.com>, Veronica Lebron <Veronica@robertsilversteinlaw.com>
Date: 11/28/2017 10:01 AM
Subject: Re: Additional Documents
Mr. Wright,

I have asked staff to complete their search before we enter Council recess (which begins 12/15) as many of them may be out of the office for the holidays.

As I stated, it has become a much larger request. I am planning to have them ready no later than Dec. 18th. I will also be sending over as I receive them. You may receive all responsive documents before this date.

Thank you,

On Mon, Nov 27, 2017 at 1:25 PM, Dan Wright <dan@robertsilversteinlaw.com> wrote:

Ms. Min -

When is your office scheduled to begin the holiday break? Is Council's final day Friday, December 15th? Will your office be on vacation by December 18, 2017? Please clarify the possible impact of your office closure on the timely production of these documents which are already seriously delayed in production.

Thank you
Daniel Wright

Daniel E. Wright, Esq.
The Silverstein Law Firm, APC
215 North Marengo Avenue, 3rd Floor
Pasadena, CA 91101-1504
T (626) 449-4200
F (626) 449-4205
Email: Dan@RobertSilversteinLaw.com
Website: www.RobertSilversteinLaw.com (<http://www.robertsilversteinlaw.com/>)

The information contained in this electronic mail message is confidential information intended only for the use of the individual or entity named above, and may be privileged. The information herein may also be protected by the Electronic Communications Privacy Act, 18 USC Sections 2510-2521. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please immediately notify us by telephone (626-449-4200), and delete the original message. Thank you.

>>>

From: Jeanne Min <jeanne.min@lacity.org>
To: Veronica Lebron <veronica@robertsilversteinlaw.com>, Dan Wright <Dan@robertsilversteinlaw.com>, "EK - Kornfeld, Esther" <Esther@robertsilversteinlaw.com>, Robert Silverstein <robert@robertsilversteinlaw.com>
Date: 11/27/2017 10:30 AM
Subject: Additional Documents
Ms. Lebron:

Attached are additional responsive documents to your Target at Sunset and Western request that were not available to me at the time I emailed. There was never an intention to withhold any of these documents.

Your clarification of item #6, however, will require a much more significant search by staff.

I have instructed staff to provide me the responsive documents as soon as possible and I will send to you in increments as I receive them.

My plan is to get the additional documents to you no later than Dec. 18.

Thank you,
Jeanne Min



JEANNE MIN

Chief of Staff

Office of Councilmember Mitch O'Farrell, 13th District

200 N. Spring Street Rm 480 Los Angeles, CA 90012

(213) 473-7013 | jeanne.min@lacity.org



JEANNE MIN

Chief of Staff

Office of Councilmember Mitch O'Farrell, 13th District

200 N. Spring Street Rm 480 Los Angeles, CA 90012

(213) 473-7013 | jeanne.min@lacity.org



JEANNE MIN

Chief of Staff

Office of Councilmember Mitch O'Farrell, 13th District

200 N. Spring Street Rm 480 Los Angeles, CA 90012

(213) 473-7013 | jeanne.min@lacity.org



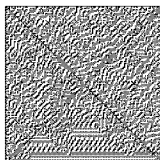
JEANNE MIN

Chief of Staff

Office of Councilmember Mitch O'Farrell, 13th District

200 N. Spring Street Rm 480 Los Angeles, CA 90012

(213) 473-7013 | jeanne.min@lacity.org



JEANNE MIN

Chief of Staff

Office of Councilmember Mitch O'Farrell, 13th District

200 N. Spring Street Rm 480 Los Angeles, CA 90012

(213) 473-7013 | jeanne.min@lacity.org

